

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

MARK E. LASKOWSKI

No. 15 CR 267

Judge Amy J. St. Eve

**MOTION FOR ENTRY OF
PROTECTIVE ORDER GOVERNING DISCOVERY**

Pursuant to Fed. R. Crim. P. 16(d), the United States of America, by ZACHARY T. FARDON, United States Attorney for the Northern District of Illinois, moves for the entry of a protective order, and in support thereof states as follows:

1. The indictment in this case charges defendant with filing a false tax return, in violation of 26 U.S.C. § 7206(1) (Count 1), and failure to file a tax return, in violation of 26 U.S.C. § 7203 (Counts 2 and 3).

2. The discovery to be provided by the government in this case includes sensitive information, the unrestricted dissemination of which could adversely affect the privacy interests of third parties. More specifically, some of the discovery is financial information and tax return information of third parties.

WHEREFORE, the government respectfully moves this Court to enter the proposed protective order.

Respectfully submitted,

ZACHARY T. FARDON
United States Attorney

By: /s/ Christopher J. Stetler
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